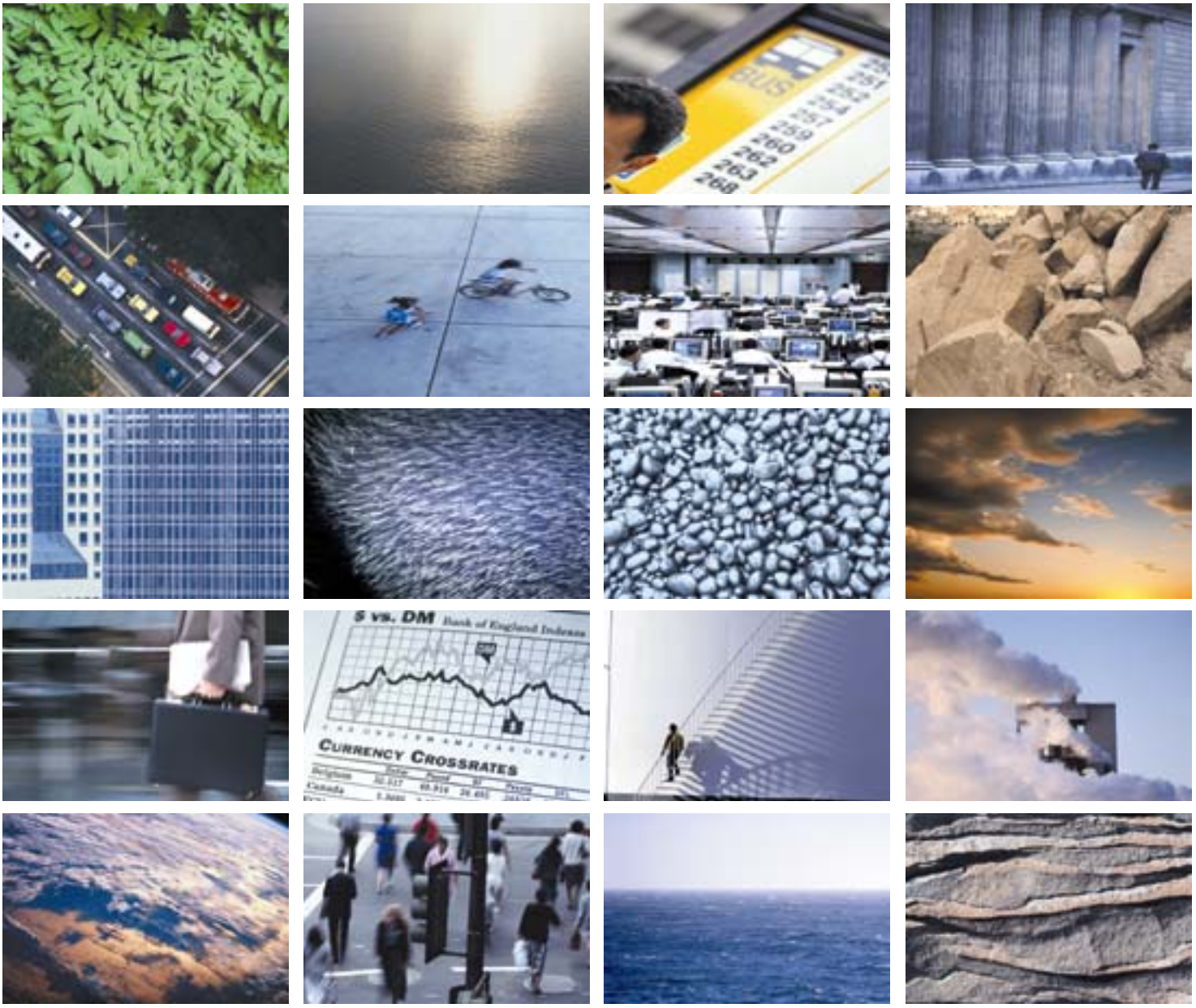

Burly Seal Self-Implementing PCB Cleanup and Disposal Revised Work Plan Amendment No. 2

Presented to:
Seals and Packings, Inc. – Burly Seals Products Co.
1900 Jay Ell Drive
Richardson, Texas 75081

March 2013

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1.0 INTRODUCTION AND PURPOSE

Environmental Resources Management (ERM) and Seals and Packings, Inc. – Burly Seal Products Co. (Burly Seal) submitted a Self-Implementing PCB Cleanup and Disposal Work Plan (Work Plan) to the EPA in May 2011. The plan presented proposed actions to clean up PCB impacts at the Burly Seal facility located at 1865 West D Avenue, Building 604, in the Utah Industrial Depot (UID) in Tooele, Utah. In accordance with the Work Plan, the PCB-affected oil, hydraulic presses and ancillary equipment were removed and properly disposed, and preliminary cleaning of the floor surfaces (indoor and outdoor) was performed. However, confirmation sampling showed PCB concentrations remained in select indoor and outdoor areas based on results obtained by both ERM and the EPA.

The confirmation sample results and proposal for next steps were presented in a Work Plan Amendment dated May 2012, which was approved by EPA. ERM performed supplemental sampling of select concrete surfaces and soils near the railroad tracks in accordance with the Work Plan Amendment to further delineate the extent of PCBs.

A Work Plan Amendment No. 2 was prepared in January 2013 to present the results of these sampling activities and present a refined approach and cleanup targets for completion of the self-implementing process. The revised approach remained consistent with the self-implementing cleanup requirements of 40 CFR §761.61.

This revised Work Plan Amendment No. 2 has been prepared based on conversations between ERM and the EPA in February 2013 about cleanup goals and the soil cleanup in the railroad tracks area. This revised Amendment provides an updated schedule for completion of the self-implementing PCB cleanup for this site.

2.0 SUMMARY OF WORK COMPLETED

This summary of work describes the supplemental activities performed during 2012, without repeating the description of activities presented in the first Work Plan Amendment (May 2012). The recent activities consisted of additional concrete surface cleaning and confirmation sampling; drain system inspection, cleaning and plugging; and sampling and analysis of soils near the railroad tracks on the west side of the Burly Seal operations where PCBs had been identified during prior EPA sampling. The activities performed are listed below for each area where actions were taken during 2012.

2.1 BOILER ROOM

On June 7, 2012, Americon confirmed the absence of grout in the Boiler Room floor drain and sump. Americon removed debris from the drain and sump and then grouted the drain and sump with concrete to seal it shut.

On June 7 and 8, 2012, Americon applied a degreaser to the northern three quarters of the Boiler Room floor and recleaned the floor using a pressure washer. ERM sampled the floor on June 11, 2012, using the same sampling method previously used only off-setting the grid by a half meter. The results, with brief descriptions of the types and locations of the samples, are presented on Table 1.

Table 1 - Boiler Room Sample Results, June 2012

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
BR-13	ERM	6/11/2012	Composite sample of concrete from boiler room floor	1.5
BR-14	ERM	6/11/2012	Composite sample of concrete from boiler room floor	12
BR-15	ERM	6/11/2012	Composite sample of concrete from boiler room floor	0.29
BR-16	ERM	6/11/2012	Composite sample of concrete from boiler room floor	4.5
BR-17	ERM	6/11/2012	Composite sample of concrete from boiler room floor	2.8

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
BR-18	ERM	6/11/2012	Composite sample of concrete from boiler room floor	0.79

2.2 *COMPRESSOR AREA*

On June 7, 2012, Americon confirmed the absence of grout in the Compressor Area floor drain. Americon then removed debris from the drain and grouted the drain with concrete to seal it shut.

On June 7 and 8, 2012, Americon applied a degreaser to the east half of the Compressor Area and then cleaned the floor using a pressure washer. ERM collected one composite sample on June 11, 2012, from four sample locations on a one meter grid. The result was 17 ppm PCBs.

2.3 *OUTDOOR CONCRETE SURFACES*

On June 8, 2012, Americon removed the soil from the concrete seam near the tote storage area using a pressure washer and then clean the concrete in the area. ERM collected one composite confirmation sample by sampling four points on a three meter grid on June 11, 2012. The result was 5.7 ppm PCBs.

On June 11, 2012, ERM collected three concrete samples outside the area where the MP Environmental bin was stored (BSS-15 to BSS-17). On July 17, 2012, ERM collected five additional concrete samples (BSS-18 to BSS-22) surrounding the BSS-16 sample. The results, with brief descriptions of the types and locations of the samples, are presented on Table 2. Figure 1 presents a map shows the sample locations.

Table 2 - Outdoor Concrete Surface Sample Results, June 2012

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
BSS-15	ERM	6/11/2012	West side of parking lot, near concrete edge	0.92
BSS-16	ERM	6/11/2012	West side of parking lot, near concrete edge	100

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
BSS-17	ERM	6/11/2012	West side of parking lot, near concrete edge	0.15
BSS-18	ERM	7/17/2012	West side of parking lot, near concrete edge	250
BSS-19	ERM	7/17/2012	West side of parking lot, near concrete edge	64
BSS-20	ERM	7/17/2012	West side of parking lot, near concrete edge	7.3
BSS-21	ERM	7/17/2012	West side of parking lot, near concrete edge	0.96
BSS-22	ERM	7/17/2012	West side of parking lot, near concrete edge	10
BSS-23	ERM	7/17/2012	West side of parking lot, near concrete edge	0.46

2.4 RAILROAD TRACK AREA

On May 25, 2012, ERM collected 14 soil samples in a grid pattern surrounding the EPA soil sample OS-3 in order to characterize the extent of the elevated PCB concentrations previously identified by EPA. Based on the detections of PCBs in these samples, additional soil sampling was performed on July 17, 2012. ERM collected an additional nine samples to further characterize the area of elevated PCB concentrations. The results from soil sampling on both dates, with brief descriptions of the types and locations of the samples, are presented on Table 3. Figure 1 presents a map shows the sample locations.

Table 3 – Railroad Soil Sample Results, June 2012

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
BSS-1	ERM	5/25/12	West of parking lot, near railroad tracks	140
BSS-2	ERM	5/25/12	West of parking lot, near railroad tracks	69
BSS-3	ERM	5/25/12	West of parking lot, near railroad tracks	27
BSS-4	ERM	5/25/12	West of parking lot, near railroad tracks	930

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
BSS-5	ERM	5/25/12	West of parking lot, near railroad tracks	500
BSS-6	ERM	5/25/12	West of parking lot, near railroad tracks	34,000
BSS-7	ERM	5/25/12	West of parking lot, near railroad tracks	300
BSS-8	ERM	5/25/12	West of parking lot, near railroad tracks	63
BSS-9	ERM	5/25/12	West of parking lot, near railroad tracks	70
BSS-10	ERM	5/25/12	West of parking lot, near railroad tracks	100
BSS-11	ERM	5/25/12	West of parking lot, near railroad tracks	23
BSS-12	ERM	5/25/12	West of parking lot, near railroad tracks	30
BSS-13	ERM	7/17/12	West of parking lot, near railroad tracks	21
BSS-14	ERM	7/17/12	West of parking lot, near railroad tracks	96
BSS-23	ERM	7/17/12	West of parking lot, near railroad tracks	0.46
BSS-24	ERM	7/17/12	West of parking lot, near railroad tracks	140
BSS-25	ERM	7/17/12	West of parking lot, near railroad tracks	5.7
BSS-26	ERM	7/17/12	West of parking lot, near railroad tracks	6.1
BSS-27	ERM	7/17/12	West of parking lot, near railroad tracks	2.3
BSS-28	ERM	7/17/12	West of parking lot, near railroad tracks	ND
BSS-29	ERM	7/17/12	West of parking lot, near railroad tracks	ND
BSS-30	ERM	7/17/12	West of parking lot, near railroad tracks	ND
BSS-31	ERM	7/17/12	West of parking lot, near railroad tracks	17

During the July sampling event ERM observed three areas of historical petroleum staining along the western edge of the parking lot, where

cracks in the concrete curbing allowed storm water to drain over the edge of the concrete pad. These areas were marked with visible hydrocarbon staining on the soil that appeared to result from historical runoff. These areas were identified as having elevated PCBs at sample locations BSS-4 (930 ppm), BSS-6 (34,000 ppm) and BSS-32 (370 ppm).

The Toxic Substances Control Act (TSCA) authorized the EPA to control substances that were determined to cause unreasonable risk to public health or the environment. The current PCB regulations in Title 40 of the Code of Federal Regulations Part 761 (40 CFR 761) were published pursuant to this act. Burly Seal received a letter from the EPA dated October 27, 2010 requiring documentation of off-site disposal of all PCB-contaminated items according to the requirements of 40 CFR 761.60 and/or documentation of decontamination in accordance with 40 CFR 761.79.

40 CFR 761.61 sets standards for self-implementing cleanups, and designates cleanup levels and disposal requirements for different types of PCB remediation wastes and different occupancy levels. The Burly Seal cleanup is being conducted pursuant to the self-implementing cleanup requirements of 40 CFR § 761.61(b), with the exception of porous materials, which are not addressed under the performance-based disposal requirements. Cleanup levels for porous materials, such as concrete, are based on the self-implementing on-site cleanup requirements of 40 CFR § 761.61(a).

The PCB remediation targets proposed for the remaining media at the Burly Seal Site are presented below.

- Indoor concrete (porous) surfaces will be cleaned or removed to achieve the standard presented in 40 CFR § 761.61(a)(4)(i)(A) for *high occupancy areas* with a cleanup level for bulk PCB remediation waste of ≤1 mg/kg (or part per million [ppm]).

- Outdoor concrete (porous) surfaces, including the compressor area, will be cleaned or removed to achieve the standard presented in 40 CFR § 761.61(a)(4)(i)(B) for *low occupancy areas* with a cleanup level for bulk PCB remediation waste of ≤25 mg/kg (ppm).

- Soil beneath concrete slabs inside the building will be cleaned up to achieve the standard presented in 40 CFR § 761.61(a)(4)(i)(B) for *low occupancy areas* with a cleanup level for bulk PCB remediation waste of ≤25 mg/kg (ppm), as soil beneath concrete slabs is not accessible to building occupants.

- The soil in the railroad track area on the west side of the Burly Seal operation between the parking lot and the railroad tracks will be removed by excavation to achieve the standard presented in 40

CFR § 761.61(a)(4)(i)(B) for *low occupancy areas* with a cleanup level for bulk PCB remediation waste of ≤25 mg/kg (ppm).

4.0 SCOPE OF REMAINING DECONTAMINATION ACTIVITIES

4.1 PRESS ROOM

Concrete samples collected from the northeast portion of the Press Room floor following the last floor cleaning by Americon showed the area closest to the office/roll-up door to meet the cleanup goal; however, the majority of the floor that was more directly under the press equipment did not meet the original 1 mg/kg cleanup goal in all areas and further cleaning and/or concrete removal and confirmation testing is required.

The subsurface soil observed beneath the concrete joints within the Press Room showed one sample with a PCB concentration of 12.9 mg/kg, and no detections above the laboratory reporting limit for two other samples. Because the PCB detection was below the low-occupancy cleanup level of 25 mg/kg, no remedial action is proposed for the subsurface soil.

Recommendation: We plan to perform an aggressive recleaning of the areas of the floor that do not meet the cleanup level. A different detergent will be employed and the detergent will be allowed to soak into the concrete before scrubbing and removal of the washing solution. For areas with the highest expected PCB concentrations, such as directly beneath the former presses, ERM may perform scarification to remove the top level of concrete following the recleaning. Following the recleaning (and scarification, if performed), ERM will perform verification sampling of the concrete surface (composite samples) over a 1.5 meter grid as described in the original Work Plan and as shown on Figure 2. Depending on the outcome of the confirmation sample results, additional cleaning and/or concrete removal may be considered (per the Work Plan) to achieve the cleanup goal. Alternatively, ERM may proceed directly to scarification to remove the top layer of concrete prior to performing confirmation sampling.

4.2 BOILER ROOM

Concrete samples collected from the Boiler Room floor show that approximately the southern half of the floor (nearest the roll-up door) has met the original cleanup goal of 1 ppm. The northern half of the floor had results in the 1.5 to 12 ppm range, which do not yet meet the original 1 mg/kg cleanup goal. Further cleaning and/or concrete removal and confirmation testing is required.

Recommendation: We will evaluate whether performing an aggressive recleaning of the area of the floor that does not meet the cleanup level is likely to achieve the necessary reductions in PCB concentration. A different detergent would be employed and the detergent would be allowed to soak into the concrete before scrubbing and removal of the washing solution. If recleaning is performed, ERM will perform verification sampling of the concrete surface (composite samples) over a 1.5 meter grid as described in the original Work Plan and as shown on Figure 3. Depending on the outcome of the confirmation sample results, additional cleaning and/or concrete removal may be considered (per the Work Plan) to achieve the cleanup goal. Alternatively, ERM may proceed directly to scarification to remove the top layer of concrete prior to performing confirmation sampling.

4.3 COMPRESSOR AREA

The Compressor Area floor was observed to have a PCB concentration of 17 ppm after cleaning, based on a single confirmation sample. Further confirmation testing is required for this area.

Recommendation: The Compressor Area is a partially-enclosed utility lean-to outside of the main building in the parking lot. The Compressor Area is entered solely for the purpose of checking or servicing the compressor, and is rarely occupied. The floor in the area has been cleaned once; however, based on visual observations we will perform an aggressive recleaning of the area. A different detergent will be employed and the detergent will be allowed to soak into the concrete before scrubbing and removal of the washing solution. Following the recleaning, ERM will perform verification sampling of the concrete surface (composite samples) over a 1.5 meter grid as described in the original Work Plan. Depending on the outcome of the confirmation sample results, additional cleaning and/or concrete removal may be considered (per the Work Plan) to achieve the cleanup goal.

4.4 OUTDOOR CONCRETE SURFACES

A concrete sample (composite of 4 individual samples on a three meter grid) was taken by ERM from the parking lot in the area of the former tote storage (TS-1). This sample was taken at the request of Cheryl Turcotte of the EPA. The result was 2.7 ppm PCBs. The EPA collected a sample of soil from the seam in the concrete in this same area (OS-1). The result was 21 ppm PCBs. The soil from the concrete seam was cleaned through pressure washing by Americon. The PCB results are below the low-

occupancy cleanup level of 25 ppm, so no further action is required for this area.

A concrete sample (composite of 3 individual samples) was taken from the parking lot in the area of the former MP Environmental bin (SW-1). This sample was taken at the request of Cheryl Turcotte of the EPA; the result was 0.30 ppm PCBs. The EPA also collected a sample of soil from the seam in the concrete in this same area, near the roll-up door to the boiler room (OS-2); the result was 114 ppm PCBs. The soil from the concrete seam was cleaned through pressure washing by Americon, and no further action is required for this area.

During assessment of the outdoor concrete surfaces, ERM observed staining that appeared to be associated with migration of hydrocarbons across the concrete parking area. Additional concrete samples were collected in these areas and concentrations above the cleanup goal of 25 ppm were observed at three locations (BSS-16, BSS-18, and BSS-19), as shown in Figure 1. Further cleaning and confirmation testing is required for this area.

Recommendation: We will complete additional characterization sampling of the concrete parking lot by sampling the concrete 3 meters south of BSS-19 to delineate the affected PCB area on the outdoor concrete surface. If the additional characterization sample has a PCB concentration >25 ppm PCBs, step-out sampling will continue at 3 meter internals until the extent of concrete with concentrations above the cleanup goal is determined. The affected area will be aggressively cleaned. Following cleaning, ERM will perform verification sampling of the concrete surface using the bulk sample method (composite samples) over a 1.5 meter grid where cleaning is performed to confirm achievement of the cleanup level. Depending on the outcome of the confirmation sample results, additional cleaning and or concrete removal may be considered (per the Work Plan) to achieve the cleanup goal.

4.5 RAILROAD TRACK AREA

The PCB results for soils in the area of the railroad tracks in the immediate vicinity of the parking area show some impacts that, based on the combination of the contamination found on the concrete pad and the likely runoff of storm water from the pad to the area between the pad and the tracks, are suspect for some level of contribution from the Burly Seal operations. The soil between the parking area and first railroad track showed concentrations of PCBs ranging from 27 to 34,000 mg/kg.

Recommendation: As directed by EPA, we plan to remove the soil from between the parking area and first railroad track that exceeds the low occupancy cleanup goal of 25 mg/kg. The soil will be handled and disposed as PCB-contaminated waste. The area from which the soil is removed will be roughly graded to leave the area with gradual changes in slopes and grades; however, no backfill soil will be placed in the excavation as long as the depth of soil removal does not exceed two feet to achieve the cleanup goal. In the event that soil excavation exceeds two feet and available on-site soil is insufficient to achieve smooth transitions between the original ground surface and finish grades, then clean, imported soil will be placed to develop smooth slope transitions. Following soil removal, ERM will perform verification sampling using the bulk sample method (composite samples) over a 1.5 meter grid where soil removal was performed to confirm achievement of the cleanup level.

5.0 SCHEDULE

Upon receipt of EPA approval of this revised Work Plan Amendment No. 2, ERM and Americon will resume the remaining activities to complete the self-implementing cleanup activities. A brief summary of the remaining tasks and estimated start dates is included below assuming approval of the Work Plan during early April 2013:

- ERM and Americon can remobilize within approximately 2 weeks of EPA approval of this Amendment to complete the following:
    - Press Room floor cleaning and confirmation sampling
    - Boiler Room floor cleaning and confirmation sampling
    - Compressor Area floor cleaning and confirmation sampling
    - Outdoor concrete surface cleaning and confirmation sampling
    - Removal of soil with PCB concentrations >25 ppm between the parking area and the railroad tracks

It is anticipated that the above activities can be completed by June 30, 2013, pending confirmation that all concrete surfaces meet the cleanup levels. If verification sampling shows that cleanup goals are not met, additional time will be required to mobilize and complete additional recleaning and/or concrete removal. If the verification sampling show that the cleanup is complete, a cleanup report will be prepared and submitted to the EPA within one month of receiving the final sample results.

Figures

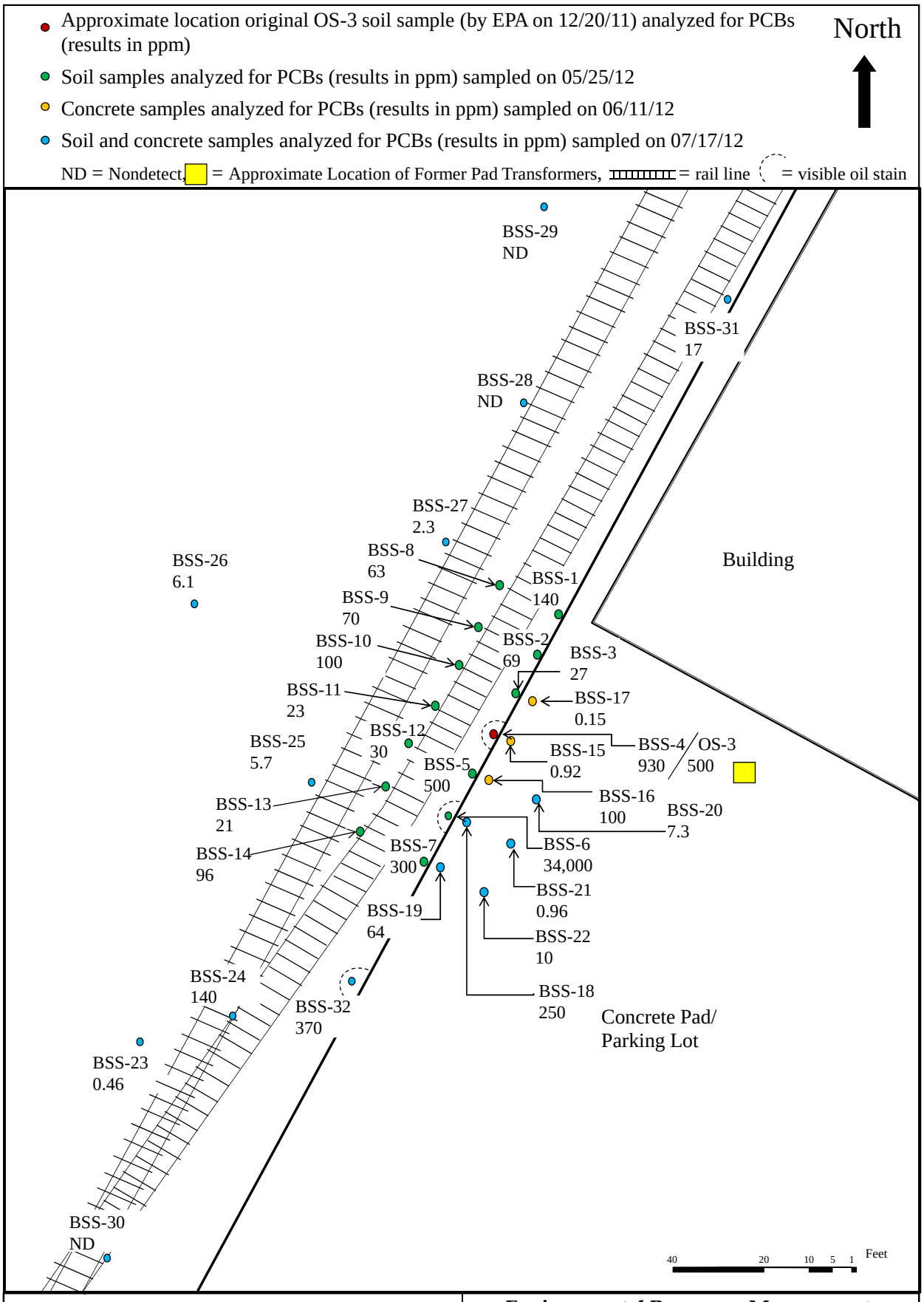


Figure 1 - Characterization Sample Results, Outdoor Concrete Surfaces and Soil in Railroad Tracks Area

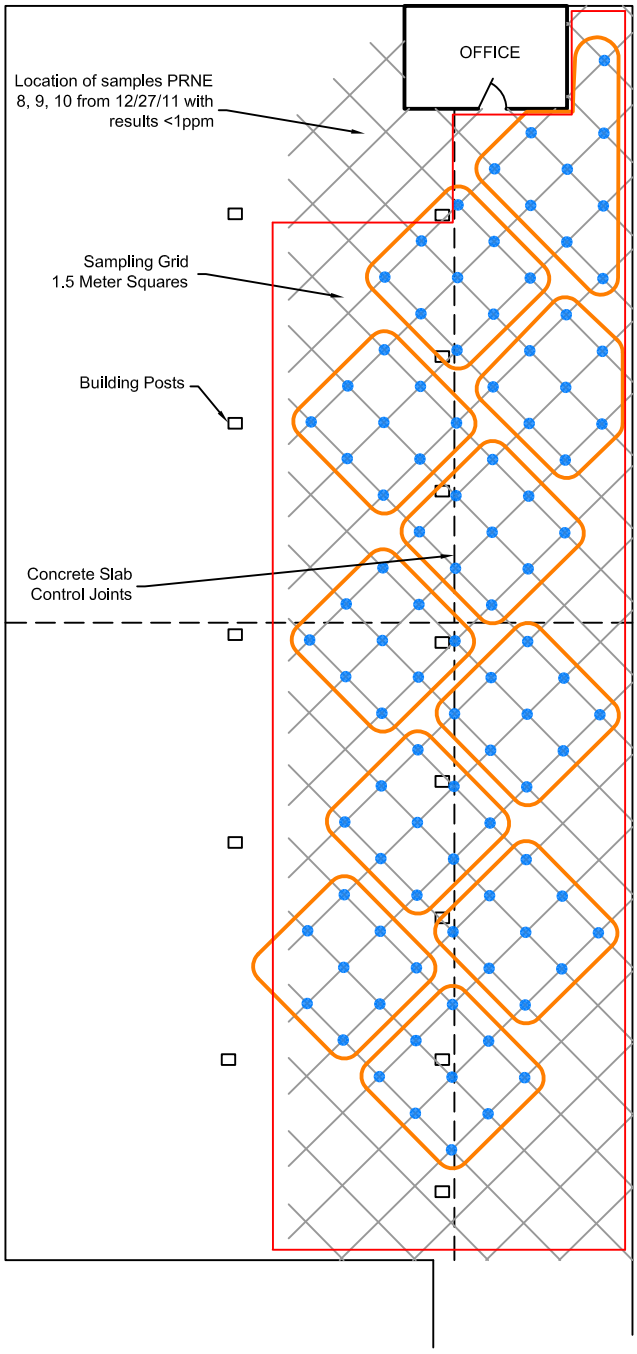
Environmental Resources Management
102 West 500 South, Suite 650
Salt Lake City, Utah 84102
801-595-8400

Burly Seal – 1865 West D Avenue, Building 604 Tooele, Utah

Drawn By: MGP
Checked By:
Date: 8/15/12

Project No. 0146470

Project No. 0129927.00
Date: 04/28/11
Drawn By: J. Estrada
CAD File: g:\\0129927\012992700-01.dwg



LEGEND
Proposed Areas of Concrete Removal
Individual Sample Points
Composite Sample Groupings

0 5
Approx. Scale (Meters)

Figure 2

Proposed Verification Sampling Locations - Press Room
Burly Seal - 1865 West D Avenue, Building 604
Tooele, Utan

ERM 04/11

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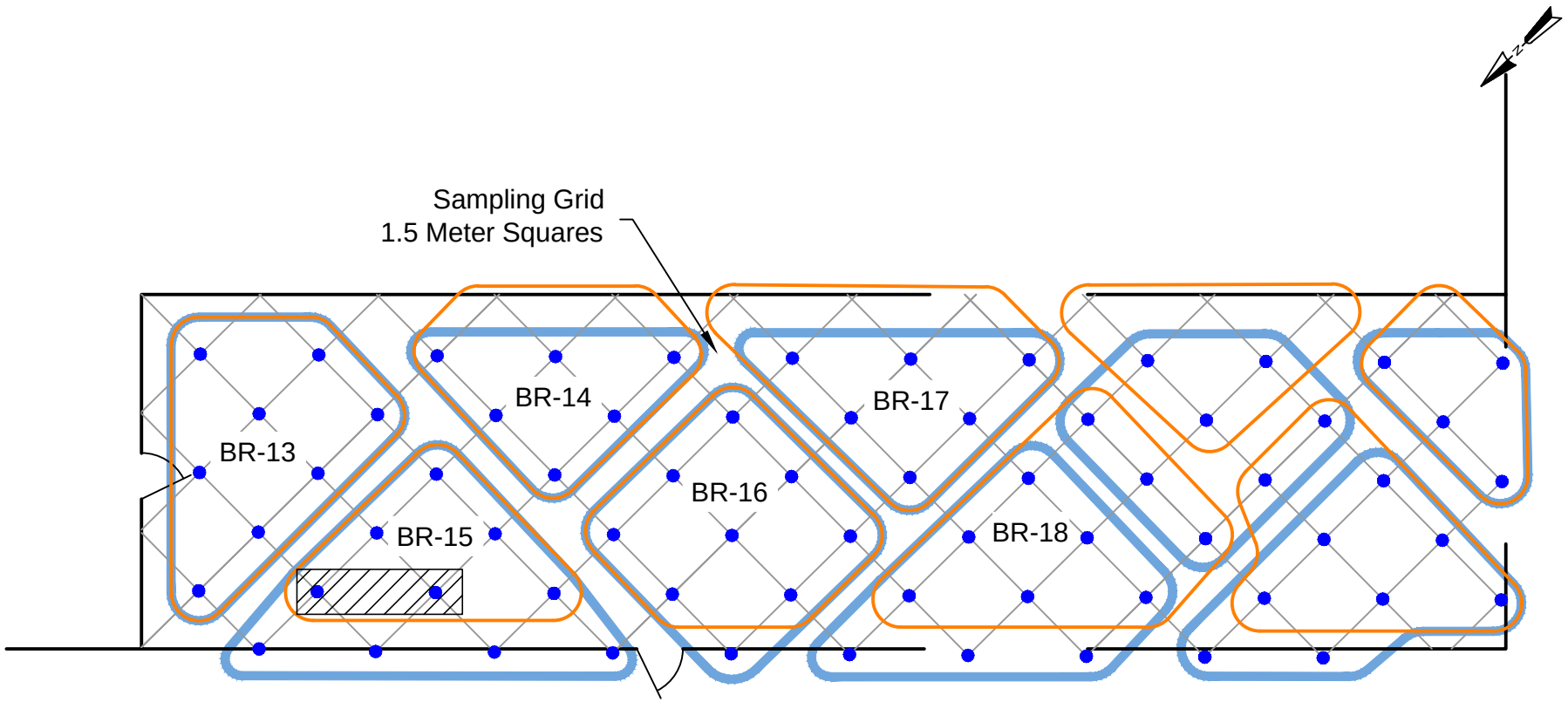

LEGEND
- Individual Sample Points
- Planned Composite Sample Groupings
- Actual Composite Sample Grouping
- Beneath Boiler Skid, Not Sampled

0 3
Approx. Scale (Meters)

Figure 3

Proposed Verification Sampling Locations - Boiler Room
Burly Seal - 1865 West D Avenue, Building 604
Tooele, Utah

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